



# **BRIDGE FROM PROPERTY TRANSFER AND THE NEW VOLUNTARY PARCEL-WIDE CLEANUP PROGRAM**

**Presented by: Claire Quinn & Amy Richardson  
Remediation Division March 4, 2026**

# GOVERNING STATUTES AND REGULATIONS FOR TODAY



**Statute 22a-134rr** - specifies which releases are exempt from RBCRs – primary determination based on when the release occurred, not who discovers it



**Section 22a-134tt-3(d) of the RBCRs** contains provisions to report and then continue under PTP for certain releases not exempted by the statute



**PA 25-54 Sections 2 and 3** modify the Property Transfer Act, including the addition of the bridge to RBCRs in **CGS 22a-134a(o)**



**PA 25-6 Section 4** establishes the new Voluntary Parcel Wide Program as part of **CGS 22a-133y(f – g)**

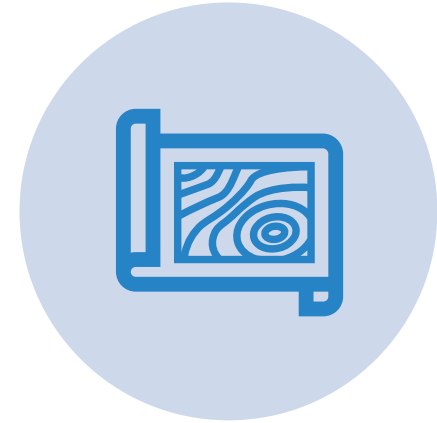
# OVERVIEW



EXISTING PROPERTY  
TRANSFER SITES



BRIDGE TO RELEASE-  
BASED PROCESS



NEW VOLUNTARY **PARCEL-**  
**WIDE CLEANUP PROGRAM**

The background features a stylized landscape with a yellow sun in the top right, green hills in the middle, and light blue water at the bottom. All elements are separated by thick, dark blue outlines. The text is centered on the green hill area.

# Existing Property Transfer Sites

# PROPERTY TRANSFER PROGRAM (PTP) – POST-MARCH 1, 2026

## What will happen to the Property Transfer Program after March 1, 2026?

- Property Transfer filings are no longer required for transfers that **occur** on or after March 1, 2026.
- Properties **with remaining obligations in the Property** Transfer Program will still need to complete site-wide investigation and remediation to achieve cleanup standards.
- There is also an opportunity to use the Release-Based process **and timelines to** close out obligations for past filings.

## Do cleanup obligations change?

- All obligations of all certifying parties remain in place, including requirements for site-wide investigation and remediation.
- On March 1, 2026, the cleanup standards for all sites, including PTP, became the RB cleanup standards.

## The Release-Based (RB) cleanup standards applicable to all sites include:

- All previous RSR options, updated and incorporated into the RB cleanup standards
- Permit by rule for Historically Impacted Material
- Managed Multifamily Residential Direct Exposure Criteria (DEC)
- Passive Recreation DEC
- and others

# RELEASE-BASED CLEANUP REGULATIONS SECTIONS

*Prescribed Process and Timelines for new Release-Based programs*



Basic rules for implementing cleanup (Discovery and Reporting) **Sections 2, 3**



**Rules for process**, timeline, and fees for characterization, **immediate and tiered risk management**, and cleanup (Characterization, Immediate Actions, Tiering) **Sections 4, 5, 6**



**Completion Documentation** needed to demonstrate cleanup is complete (Certifications, Verifications, Release Remediation Closure Reports) **Sections 8, 11, 12; Audits Section 13**



**Cleanup Standards** achieved using numeric criteria or in combination with alternates, variances, institutional controls, engineered controls, **using common definitions** **Sections 1, 7, 8, 9, 10**

*All properties use the same R-B Cleanup Standards*

# RSRs Now Refer to the Following Sections of the RBCRs

## RCSA 22a-134tt-1(a) thru RCSA 22a-134tt-1(d)

- (a) Definitions
- (b) Construction of Regulations
- (c) Use of Form Prescribed by Commissioner
- (d) General Requirements for Analytical Data

## RCSA 22a-134tt-7 thru RCSA 22a-134tt-10 "Cleanup standards sections"

- -7 General Cleanup Standards Provisions
- -8 Releases Certified as Closed by a Permitted Environmental Professional
- -9 Cleanup Standards for Soil
- -10 Cleanup Standards for Groundwater

## RCSA 22a-134tt-App2 thru RCRA 22a-134tt-App12

- App2 Direct Exposure Criteria
- App3 Pollutant Mobility Criteria
- App4 Groundwater Protection Criteria
- App5 Surface Water Protection Criteria
- App6 Volatilization Criteria for Groundwater
- App7 Volatilization Criteria for Soil Vapor
- App8 (Equations & Calculations for Criteria)
- App9 (Equations & Calculations for Alt PMC)
- App10 Potential Alt GWPC Map
- App11 Managed Multifamily Residential DEC
- App12 Passive Recreation DEC

# CLEANUP STANDARDS SECTIONS OF RBCRs (AKA RSRs) VS ALL RBCR EXEMPTIONS – NOT ALL SECTIONS OF RBCRs APPLY TO PTP SITES

## **RSR Provisions still in RBCR sections**

Incidental trihalomethanes

RCSA 22a-134tt-10(f)(1)

Incidental asphalt

RCSA 22a-134tt-10(f)(2)(B) and  
RCSA 22a-134tt-9(b)(5)(B)

Incidental motor vehicles

RCSA 22a-134tt-10(f)(2)(A) and  
RCSA 22a-134tt-9(b)(5)(A)

Background metals

RCSA 22a-134tt-1(a)(12)

## **RCSA 22a-134tt-1(i) – Not part of Cleanup Standards Sections**

Residential activity exemption

PFAS or road salt in drinking water  
supply

PFAS in land and waters

Incidental trihalomethanes

Incidental asphalt

Incidental utility poles/ landscaping

Incidental motor vehicles

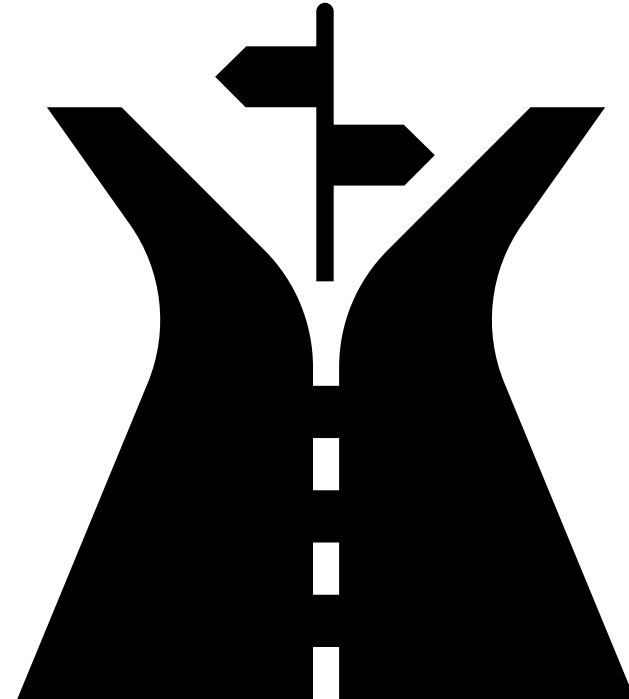
Lower bounds

Public roadway

Naturally occurring metals

# WHEN SHOULD RELEASES BE ADDRESSED UNDER PTP vs RBCRs?

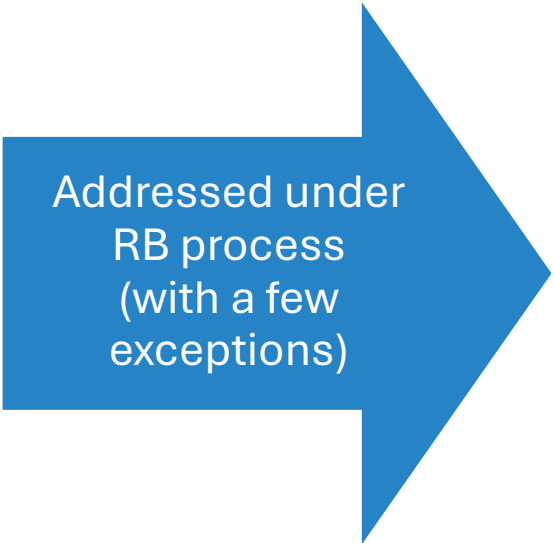
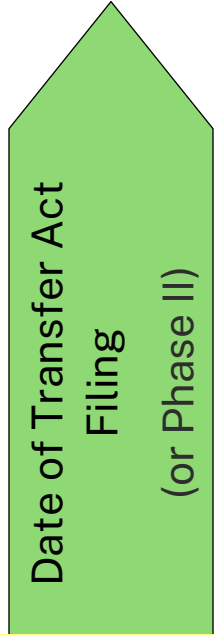
- Statute specifies which releases are exempt from RBCRs – primary determination based on when the release occurred, not who discovers it (CGS 22a-134rr)
- RBCRs contain provisions to report and then continue under PTP for some releases not exempted by the statute
- Releases are generally addressed under one or the other - not both.



# I just discovered a release at a Property Transfer site, do I need to report under the release-based (RB) process?

When did the release occur?

Releases that occurred before the transfer filing are addressed under Property Transfer (Legacy releases)



Releases that occur after the transfer filing / Phase II are addressed under RB process

New spills must be reported to DEEP Dispatch and are typically addressed with RB process

[PTP info sheet on DEEP website](#)

# RELEASES AT PROPERTY TRANSFER SITES

## CGS 22a-134rr

(1) Only **releases that occurred prior** to the filing of a Form I, Form II, Form III or Form IV but that **were not discovered until**

- (A) after the date of the commissioner's approval of the remediation, or
- (B) the date to which the verification applies, as designated on the form submitted to the commissioner in connection with a Form III or Form IV verification, or
- (C) the date on which the Form I or Form II was filed

shall be subject to the requirements of sections 22a-134qq to 22a-134xx, inclusive;

(2) Any **release that occurs after** the filing of a Form I, Form II, Form III or Form IV shall be **subject to the requirements** of sections 22a-134qq to 22a-134xx, inclusive,

except that

when a **Phase II** investigation has been **completed after the filing** of a Form III or Form IV, **only releases which occur after the date of the Phase II** investigation shall be **subject to the requirements** of sections 22a-134qq to 22a-134xx, inclusive; (...)

# WHEN DID THE RELEASE OCCUR?

- How do you know?

## Evidence that the release existed prior to the filing date or completion of the Phase II

- Laboratory data from before the filing date
- Photos
- Information about the use of a particular geographic area, including anecdotal reports of historical disposal or releases, aerial photographs, and maps
- Other evidence

# WHICH PROGRAM?

## Property Transfer

At a PTP site, a release of chlorinated solvents is discovered in the soil as part of a Phase II investigation. Before the transfer, the site was previously a dry cleaner that used chlorinated solvents. Since the transfer, the site has only been used as a fitness studio.

At a PTP site, polluted fill is found beneath the building during demolition in June 2026. The building was built in the 1980s.

## Release-Based Process

At a PTP site, the operations changed from a plating shop to auto repair upon transfer of the property. As part of confirmation sampling in April 2026 following soil excavation for metals, petroleum contamination is present in the soil by the back area where cars are stored for repair. Soil samples taken previously had not found any releases of petroleum in the same area and petroleum was not a COC for that area.

# KEY QUESTIONS

Are you (or  
your client)  
the C/M?

**When did  
the release  
*occur?***

When was  
the release  
*discovered?*

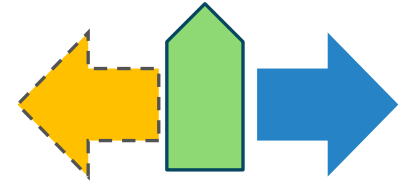
C/M =  
Creator/Maintainer

# RELEASES THAT OCCURRED BEFORE PROPERTY TRANSFER FILING

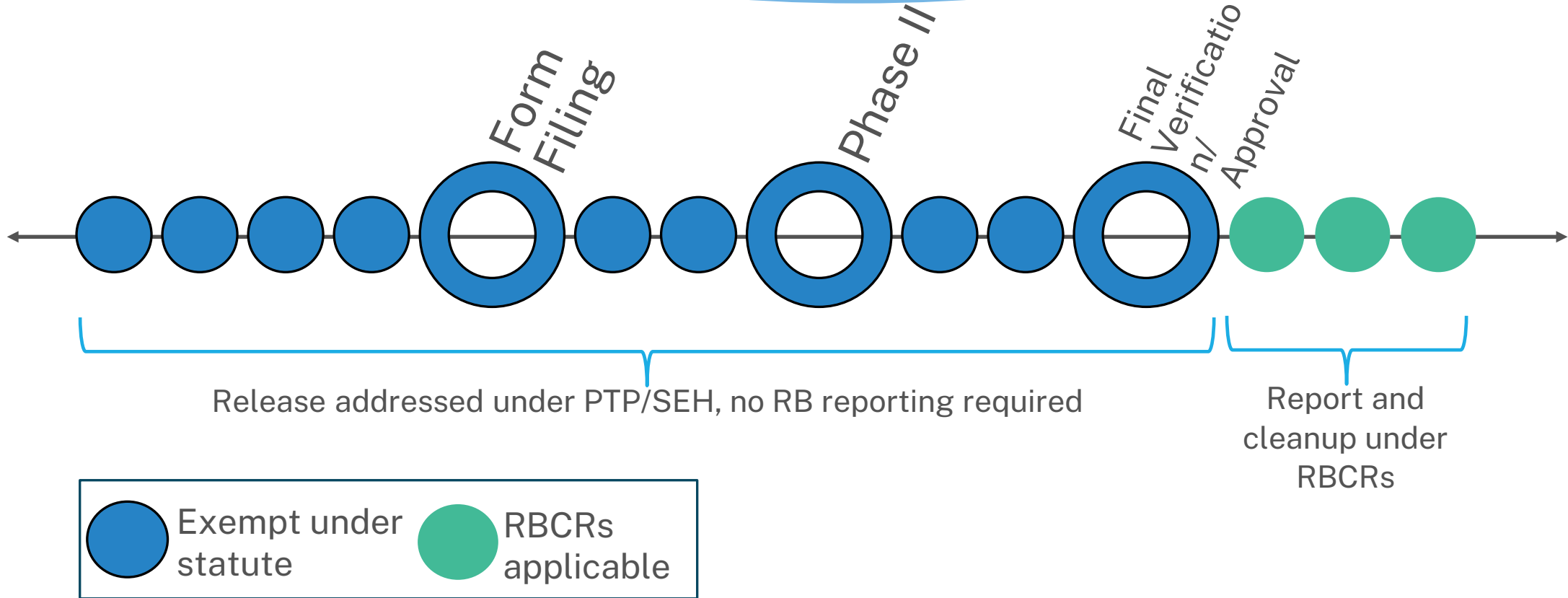
When did the release occur?



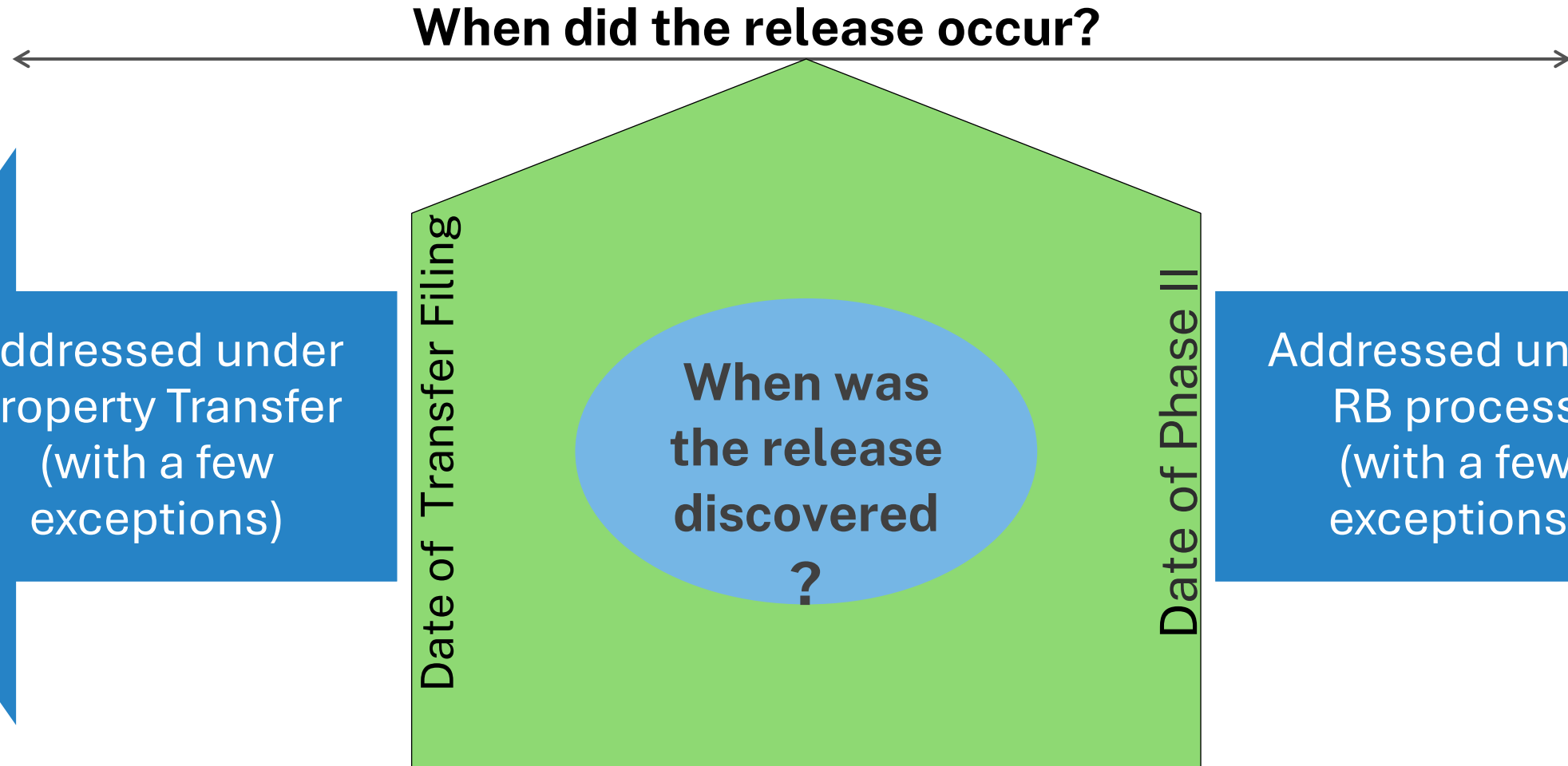
# RELEASES THAT OCCURRED BEFORE THE TRANSFER FILING



When was the release discovered?



# RELEASES BETWEEN THE TRANSFER FILING AND THE PHASE II



# RELEASES AT PROPERTY TRANSFER SITES - RCOSA 22A-134TT-3(D)

## (d) Reports of Existing Releases Discovered on Transfer Act Sites

1. If an **existing release that is not exempted by statute** is discovered on a Transfer Act site, a report of such release shall be provided to the commissioner under the RBCRs
2. If remediation of the parcel is ongoing and
  - a final verification has not yet been submitted, and
  - the discovered release **is not a release requiring immediate action,**

any report filed shall specify whether:

(A) the release will be remediated pursuant to the process and to the standards specified in the **RBCRs;**

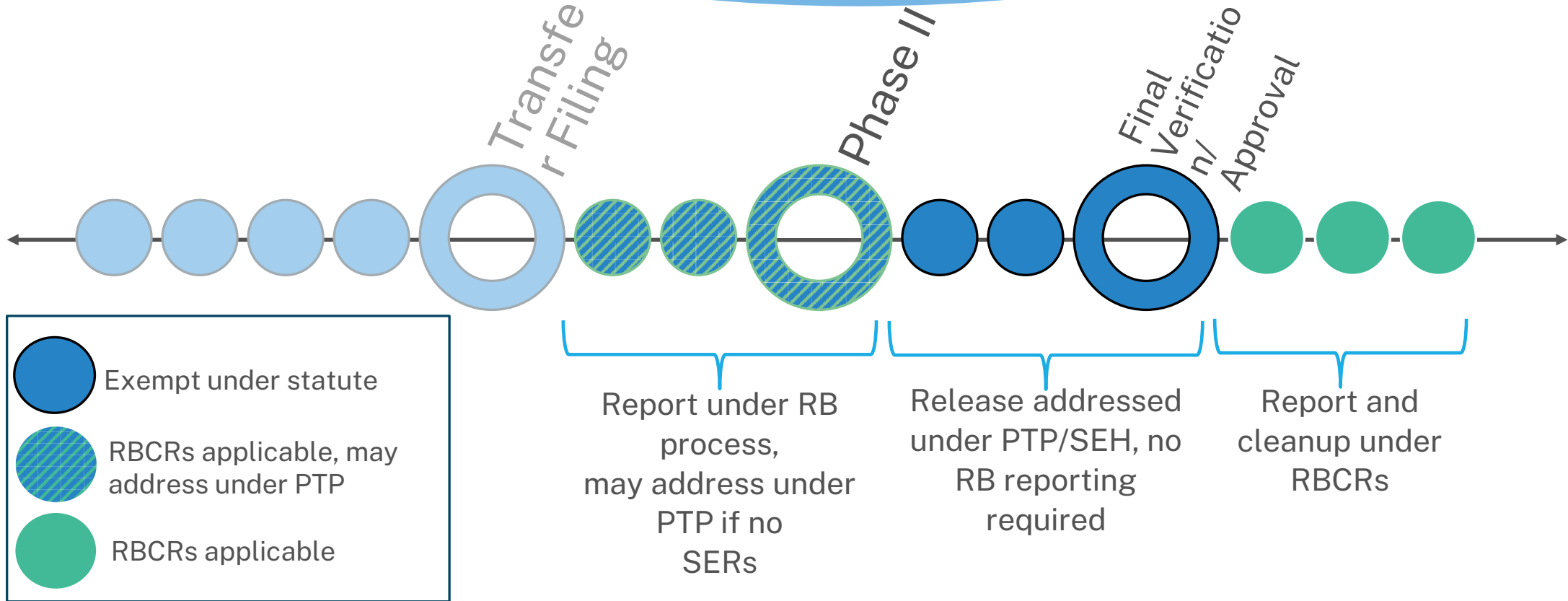
**or**

(B) the release will be remediated pursuant to the requirements and standards specified by the **Transfer Act** and

a Form III verification or Form IV **verification** for the parcel which includes such release will be provided **not later than the deadline for verification of the parcel** specified in section 22a-134a(g)(c) of the Connecticut General Statutes, **without extension of such deadline.**

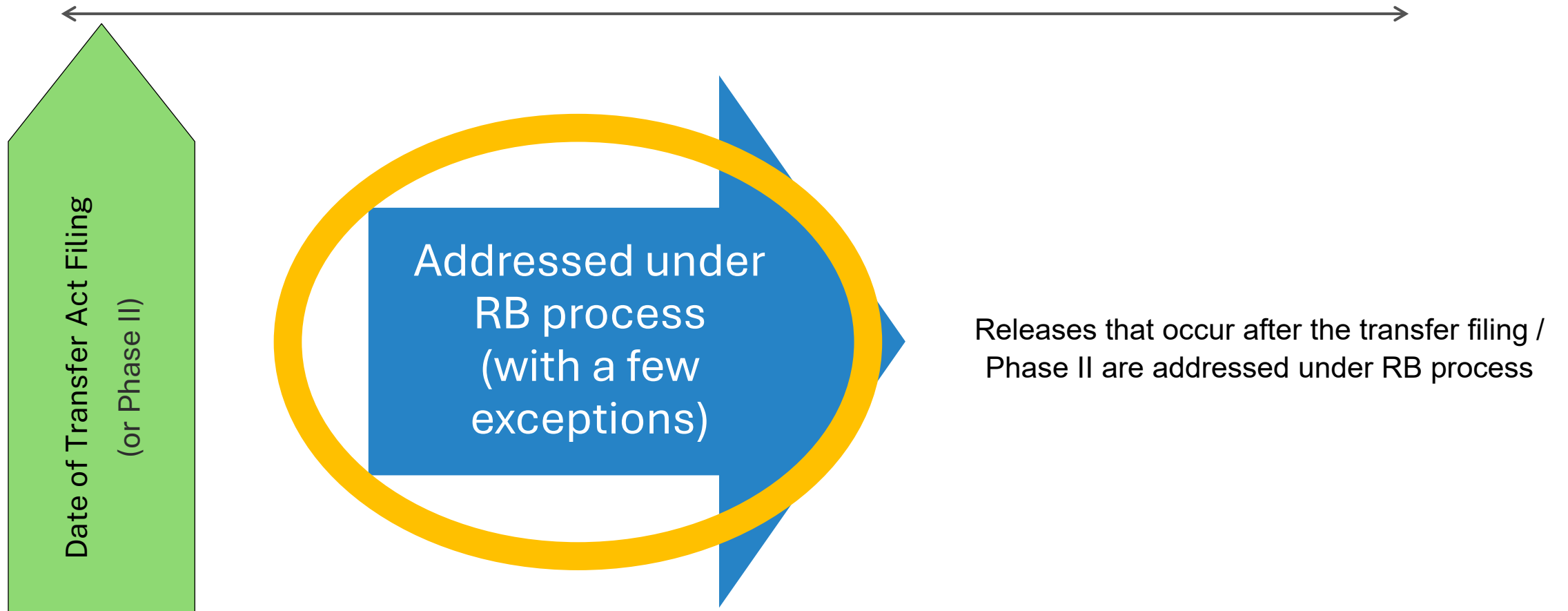
# RELEASES THAT OCCURRED BETWEEN THE TRANSFER FILING & THE PHASE II

When was the release discovered?

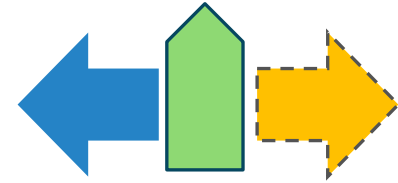


# RELEASES THAT OCCURRED AFTER THE PHASE II

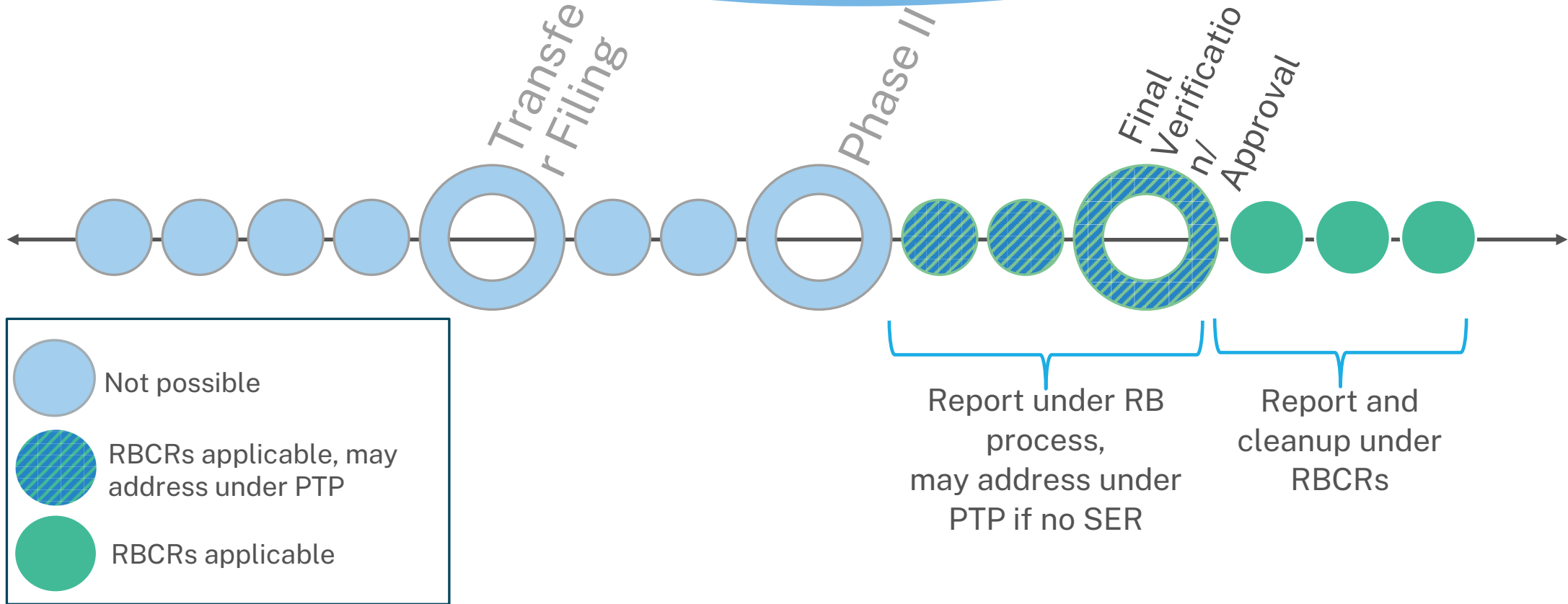
When did the release occur?



# RELEASES THAT OCCURRED AFTER THE PHASE II



When was the release discovered?



# **CASE STUDY 1**

**An auto body shop transferred in Oct 2025, investigation is ongoing and a Phase II has not yet been completed. In May 2026, as part of the sensitive receptor evaluation for the site, results show a drinking water well onsite has VOCs present in it. No prior data for the drinking water well is available.**

**1. Should this be reported as an SEH or an SER?**

**2. Under which program will the release be addressed?**

- Property Transfer
- Release Based Process
- Reported under Release Based, may be addressed under Property Transfer

# CASE STUDY 1 - EVALUATION

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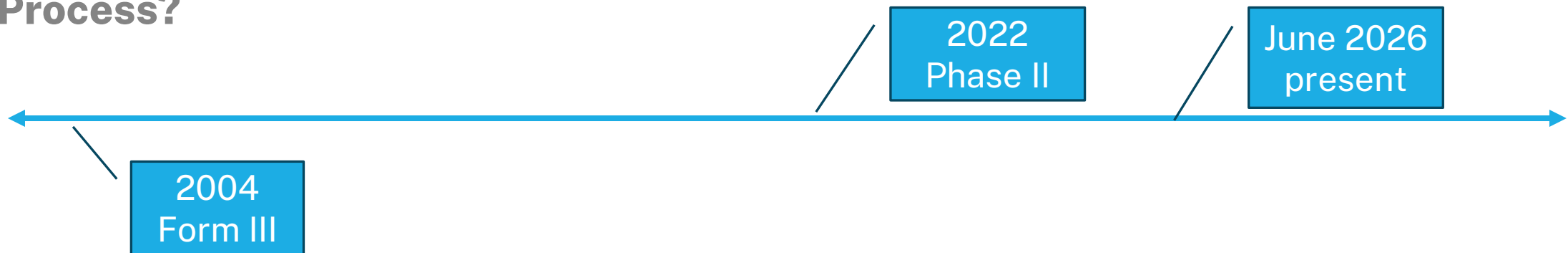
- This release should be reported as an SER - a phase II has not yet been completed for the property, so CGS 22a-134rr specifies the RBCRs apply.

## **2. Under which program will the release be addressed?**

- This release must be reported and addressed under Release Based, because the Property Transfer reporting provision in 22a-134tt-3(d) (RCSA) does not apply if any immediate actions are required.

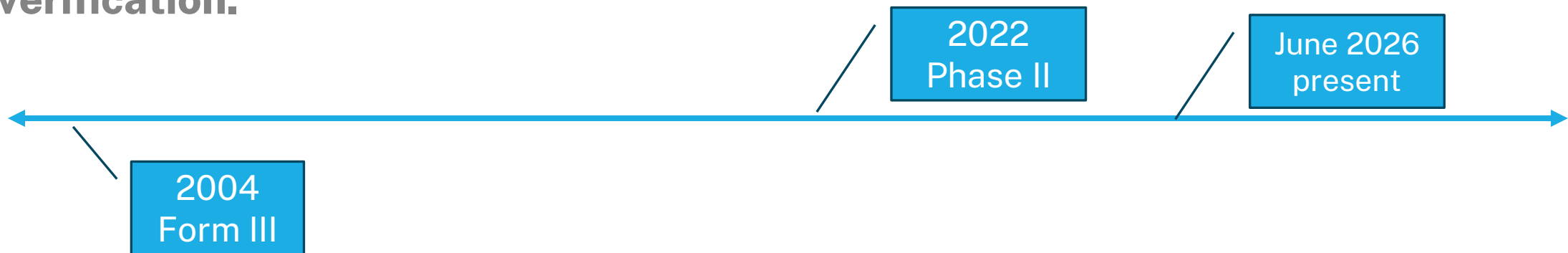
## CASE STUDY 2

- It's June 2026 and I have been working on investigation and remediation of a site since 2021. The site had transferred and filed a Form III in 2004. We completed a site-wide Phase II in 2022. While working on our Phase III investigation, a pile of debris was found half buried in the woods at the back of the property. Soil samples indicate a release of trivalent chromium at 5,000 ppm that was previously unknown. Chromium is used in the current process at the site and it is unclear when the debris was placed there.
- Should this release be reported under the Release-Based Process?
- Should this release be addressed under Property Transfer or the Release-Based Process?



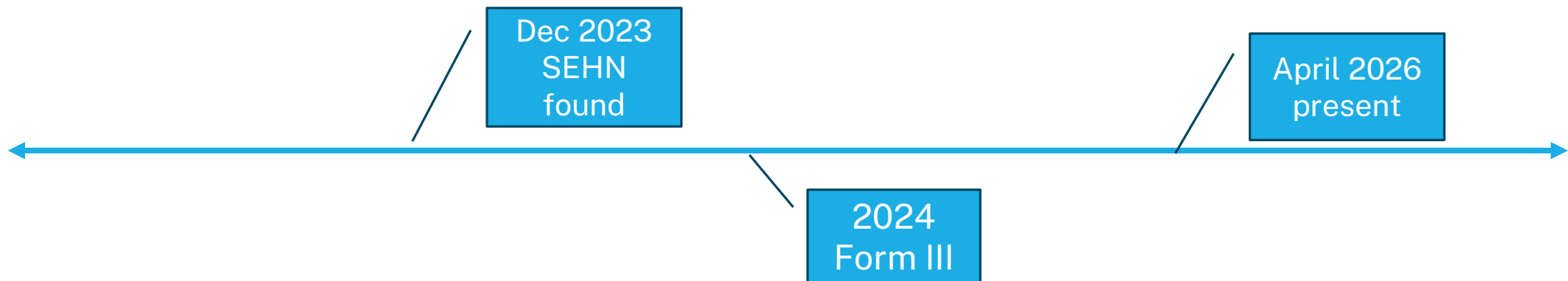
## CASE STUDY 2 - EVALUATION

- This release must be reported under the Release-Based Process, but may be addressed under either Property Transfer or the Release-Based Process.
- There is no specific evidence of when the release occurred, and a site-wide Phase II has been completed, so the statutory exemption does not apply.
- A verification has not been submitted, so the PTP reporting section of the RBCRs does apply (RCSA 22a-134tt-3(d)).
- An RBCR release report must be submitted, which will specify whether the release will be remediated under the RBCRs or as part of a Form III or Form IV verification.



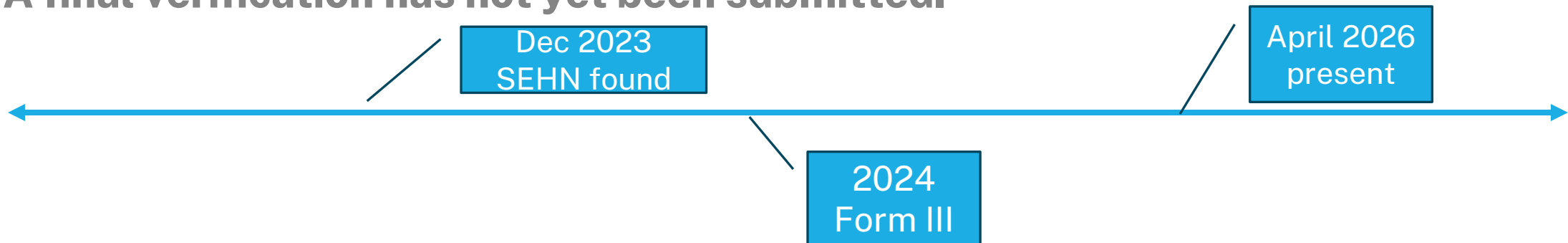
# CASE STUDY 3

- **It's April 2026 and I recently took over leading cleanup efforts at a property. Some work had been done previously, but never a site-wide Phase II. While reviewing files, I realized that the property owner was notified of a SEH condition in surface soil in December 2023 by a prior consultant. The site is in the Property Transfer Program, with a Form III filed in 2024. Will this release be addressed as an SEH/Property Transfer or an SER/Release Based Process?**



# CASE STUDY 3 - EVALUATION

- Will this release be addressed as an SEH/Property Transfer or an SER/Release Based Process?
- This release will be addressed as an SEH and Property Transfer.
- The release was discovered in December 2023, so must have occurred prior to that.
- The property transfer filing date is 2024, so the release occurred before the filing date.
- A final verification has not yet been submitted.

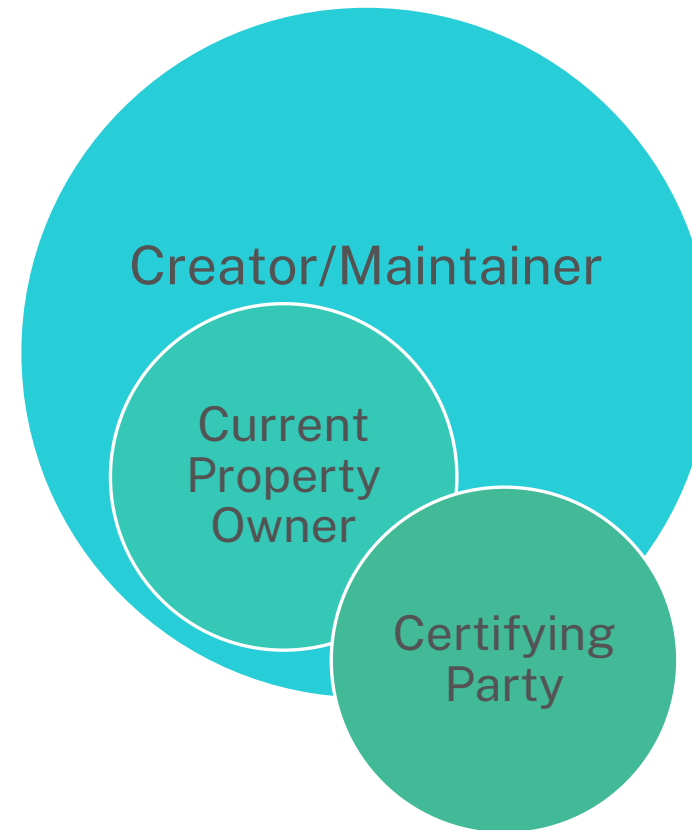


# Are you (or your client) the Creator or Maintainer?

**The current owner of a property is considered a maintainer of a release, *regardless of fault for the creation of a release.***

**The certifying party under PTP may be the creator or the maintainer.**

**If the certifying party is not the creator or maintainer, they are not required to report (still must notify creator/maintainer if SER is present)**

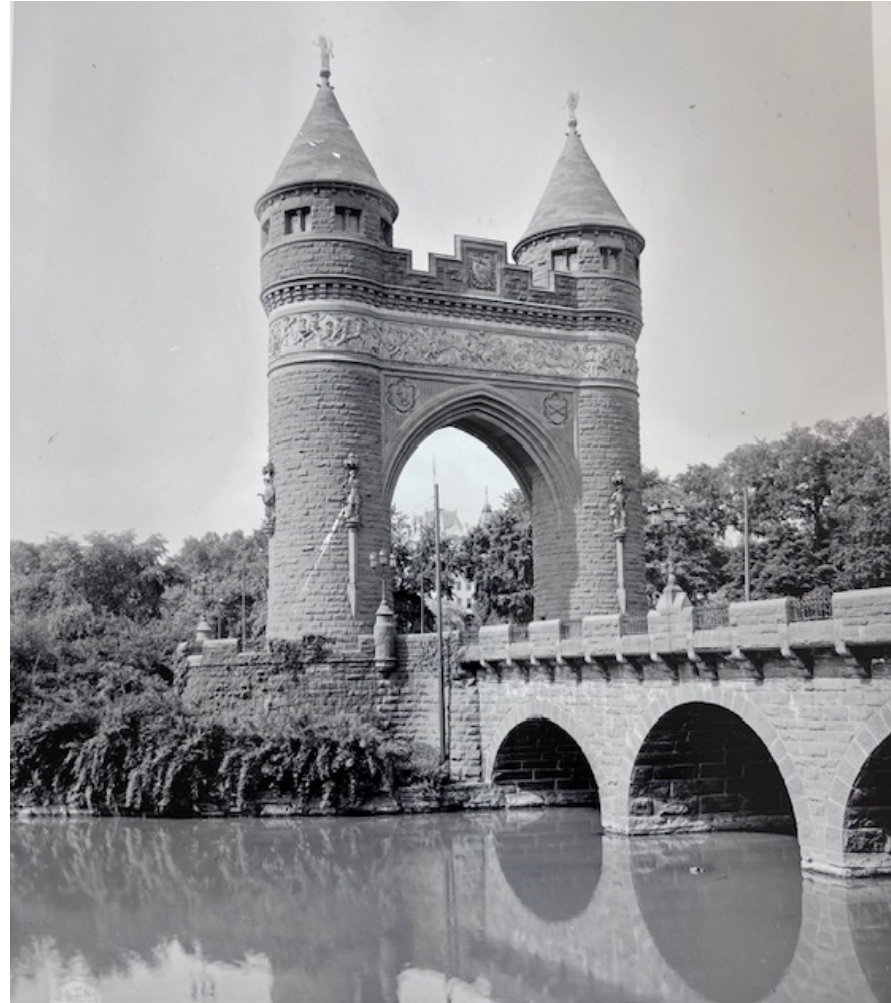


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# **Bridge to Release- Based Process**

# BRIDGE TO RELEASE-BASED PROGRAM

- **Eligibility**
- **Timeline**
- **Filing Closure**
- **Sitewide Closure**
- **Why choose this?**



# BRIDGE TO RELEASE-BASED PROGRAM

## Eligibility:

### •Who:

Certifying Party

### •When:

after the establishment is investigated in accordance with prevailing standards and guidelines

### •How:

Submit Release Catalogue Report



PA 25-54

CGS 22a-134a(o)(1)

# BRIDGE TO RELEASE-BASED PROGRAM

## Timeline:

- **Release Catalogue Report may be audited within 90 days of submittal, audit completed within one year – written audit findings of accept or reject**
- **90 days after submittal (or acceptance if audited) – may address each catalogued release under RB process**
- **1 year after submittal of Catalogue Report, submit Release Remediation Closure Report or tier each release (or choose to go back to PTP process)**
- **May group releases for tier assignment (RCSA 22a-134tt-6(h))**

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CGS 22a-134a(o)(3)

# BRIDGE TO RELEASE-BASED PROGRAM: COMPLETION

PA 25-54  
CGS 22a-134a(o)(4)(A)



Completion for a Property Transfer Filing



When a closure report has been submitted for all releases, Certifying Party may request a No Further Audit Letter-134a



DEEP will issue such letter if:

Each release in the catalogue has a release remediation closure report

All closure reports have been accepted or the audit period has expired

# BRIDGE TO RELEASE-BASED PROGRAM: SITE COMPLETION

PA 25-54

CGS 22a-134a(o)(4)(B)



Sitewide Completion

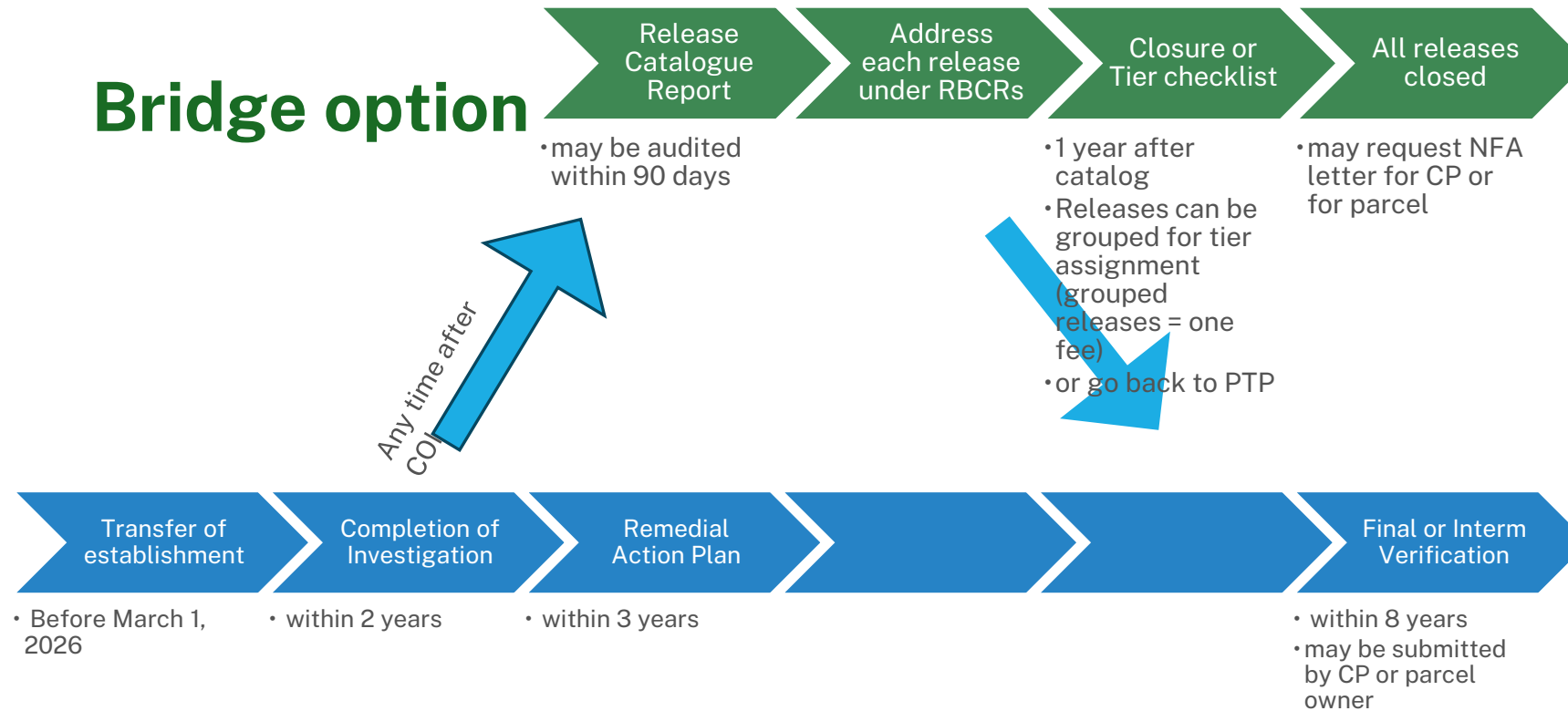
When a closure report has been submitted for each release in the Catalogues for all filings at the site

DEEP will issue a letter indicating there are no further obligations under CGS 22a-134a at the parcel if:

Each release in the catalogue(s) has a release remediation closure report

All closure reports have been accepted or the audit period has expired

# BRIDGE TO RELEASE-BASED PROGRAM



# ADVANTAGES OF THE BRIDGE PROGRAM

- **Catalogue report defines all releases identified for PTP investigation**
- **Creates certainty of what releases DEEP expects to be addressed at the parcel to complete PTP**
- **Ability to use exemptions in 134tt-1(i)**



## **RCSA 22a-134tt-1(i) – Not part of RSRs**

- Residential activity exemption
- PFAS or road salt in drinking water supply
- PFAS in land and waters
- Incidental trihalomethanes
- Incidental asphalt
- Incidental utility poles/ landscaping
- Incidental motor vehicles
- Lower bounds
- Public roadway
- Naturally occurring metals

# OTHER RECENT CHANGES TO PROPERTY TRANSFER LAW

- 1. An owner of a parcel may now submit a Form III or Form IV verification, even if they are not the certifying party for the filing. (CGS 22a-134a(h))**
  - Any certifying party may use such verification to demonstrate compliance if audit window has passed or if an audit has been completed.
- 2. Added definitions in CGS 22a-134(30-32)**
  - Portion
  - Release
  - Release Remediation Closure Report
- 3. A release remediation closure report counts as a portion verification (CGS 22a-134a(g)(2)(A))**

# 133X AND LEGACY 133Y TRANSITIONS

- 1. 133x program remains in place, but does not exempt releases from RB Process**
- 2. Remedial Action Plans and Remedial Action Reports under Legacy 133y program can no longer be submitted, as of March 1, 2026.**
- 3. If cleanup was initiated prior to March 1, 2026 using the 133y program, then you may complete that cleanup by enrolling in the Voluntary Parcel-Wide Cleanup Program.**  
(Automatic transition to the new 133y does not happen.)
- 4. New Voluntary Parcel-Wide Cleanup Program is separate from the legacy 133y. Not the same program, eligibility or requirements.**

**Will continue this topic on 133x and Legacy 133y  
at next week's training session**

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# **New Voluntary Parcel- Wide Cleanup Program**

# VOLUNTARY PARCEL-WIDE CLEANUP PROGRAM

- **Details**
- **Timeline**
- **Fees**



# WHEN TO USE VOLUNTARY PARCEL-WIDE CLEANUP PROGRAM

PA 25-6

CGS 22a-133y(f - g)



LEP may conduct a parcel-wide Phase II and Phase III



Any property that has or may have been subject to a release



Municipality may hire an LEP to conduct Phase II and Phase III without liability on any parcel with an unknown owner, a lien for back taxes



Phase II initiated before or not more than 60 days after discovery of a release on the parcel (immediate actions still must be addressed according to their timelines)



Not for Property Transfer sites and generally not for sites with current enforcement actions

# TIMELINE FOR VOLUNTARY PARCEL-WIDE CLEANUP PROGRAM

What	When	How
Provide notice to DEEP of intent to enter the program	Not later than the earliest deadline to report any releases discovered	File an Environmental Condition Assessment Form (ECAAF) in <b>REACT</b> indicating the intent to enter the parcel wide program
Submit Tier Characterization Report for all discovered releases that are not closed	2 years after initiation of Phase II	Submit Tiers Checklist in REACT
Releases will be grouped and assigned to LEP supervised tier with longest timeline (Tier 3)	At tiering	The group of releases has a single release fee - \$500 base fee plus annual fees
Closure Report deadline extended 1 year from the standard Tier 3 schedule	Due 6 years after tiering	Also eligible for Commissioner approval of schedule extension requests

PA 25-6  
CGS 22a-133y(h)

# UPCOMING TRAINING SESSIONS

## TRAINING WILL CONTINUE INTO MID-JUNE

- <https://portal.ct.gov/deep/remediation--site-clean-up/comprehensive-evaluation-and-transformation/react-and-release-based-cleanup-regulation-training>

March 4, 2026, 10:30 a.m. - 12:00 p.m.	PTP/new Parcel-Wide	Bridge from Property Transfer Program and process for the new Voluntary Parcel-Wide Cleanup Program	<a href="#">Register for March 4</a>
March 11, 2026, 10:30 a.m. - 12:00 p.m.	Legacy	Integration of other existing legacy programs	<a href="#">Register for March 11</a>
March 18, 2026, 2:00 - 3:00 p.m.	RBCRs	RBCRs - Office Hours - Q&A	<a href="#">Register for March 18</a>
March 25, 2026, 10:30 a.m. - 12:00 p.m.	RBCRs	New Remedy Solutions - Focused Session 7	<a href="#">Register for March 25</a>
April 1, 2026, 10:30 a.m. - 12:00 p.m.	RBCRs	LEP Verifications and Audits - Focused Session 8	<a href="#">Register for April 1</a>
April 8, 2026, 10:30 a.m. - 12:00 p.m.	RBCRs	Road Salt and PFAS - Focused Session 9	<a href="#">Register for April 8</a>
April 15, 2026, 10:30 a.m. - 12:00 p.m.	RBCRs	Tiering and Fees - Focused Session 10	<a href="#">Register for April 15</a>
February 5, February 19, February 26, March 5, March 19, March 26, 2026 <b>All sessions Thursdays 10:00 a.m. - 12:00 p.m.</b>	REACT	<a href="#">Introduction to REACT Online Portal</a>  Training Session-- same session each week: <i>Feb 26 will also feature Immediate Actions in REACT</i>	<a href="#">Click to join training session</a>
February 6, February 20, February 27, March 6, March 20, March 27 <b>All sessions Fridays 10:00 a.m. - 12:00 p.m.</b>	REACT	Help Session--Q&A on how to use REACT online portal	<a href="#">Click to join help session</a>

# QUESTIONS?

Questions about the RBCRs and the REACT portal may be submitted using this [Question submittal tool](#)

Responses to submitted questions will be provided in

- updates to Frequently Asked Questions documents,
- Q&A annexes to training courses, or
- individually if appropriate.

